

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: PHILLIP E. REED</b>	)	<b>CHAPTER 13</b>
<b>SHANNON R. REED,</b>	)	
<b>DEBTORS</b>	)	
	)	<b>CASE NO. 1:18-BK-03120</b>
	)	
<b>M&amp;T BANK</b>	)	
<b>MOVANT</b>	)	
	)	
<b>PHILLIP E. REED</b>	)	
<b>SHANNON R. REED,</b>	)	
<b>RESPONDENTS</b>	)	
<b>CHARLES DEHART, III, TRUSTEE</b>	)	

**DEBTORS' RESPONSE TO MOTION OF M&T BANK MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001**

1. Movant, M&T Bank, filed its Motion for Relief from Stay on May 15, 2020.
2. Debtors acknowledges some mortgage payments are past due.
3. Debtors desires the opportunity to cure any post-petition mortgage arrears and keep their home.
4. Debtors requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Phillip E. Reed and Shannon R. Reed, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed May 15, 2020 by M&T Bank.

Dated: May 28, 2020

/s/Stephen Wade Parker  
Stephen Wade Parker (315606)  
Counsel for Debtors  
Mooney Law  
2 S. Hanover Street  
Carlisle, PA 17013  
Swp@mooney4law.com  
(717) 243-4770 Phone  
(717) 632-3612 Fax